



U.S. Department of Justice

United States Attorney  
 Southern District of New York

The Silvio J. Mollo Building  
 One Saint Andrew's Plaza  
 New York, New York 10007

August 18, 2022

**BY ECF**

The Honorable Ronnie Abrams  
 United States District Judge  
 Southern District of New York  
 40 Foley Square  
 New York, New York 10007

**Re: *United States v. Sukhrob Sobirov, 20 Cr. 653***

Dear Judge Abrams:

The Government respectfully submits this letter in response to the letter filed by the above-referenced defendant on August 18, 2022. *See* Dkt. No. 166. The defendant's letter requests a modification of the conditions of release to allow the defendant to "travel to New Jersey and Pennsylvania to visit family and to shop." The Government opposes the defendant's request.

The defendant's letter states that defense counsel "informed the AUSA and Pretrial Services of this request" and that the request was "not opposed by the Government" and was consented to by Pretrial Services. Dkt. No. 166. The Government believes that defense counsel is referring to an email that defense counsel sent to the Government and Pretrial Services on May 4, 2022. That email stated that the defendant was seeking permission to "visit family in PA and NJ." However, that email did not seek permission to travel for purposes of shopping. The Pretrial Services Officer replied to the May 4, 2022 email on the same date, stating that Pretrial Services did not object to modifying the conditions of release to allow travel "for family purposes." The Government did not reply to the May 4, 2022 email. To the Government's knowledge, neither Pretrial Services nor the Government has ever indicated a willingness to modify the conditions of the defendant's release to allow travel for shopping.

In addition, the circumstances of this case have changed since May 4. The defendant entered a guilty plea on May 26, 2022. Accordingly, under 18 U.S.C. § 3143, there is a presumption that the defendant "shall ... be detained, unless the judicial officer finds by clear and convincing evidence that the person is not likely to flee or pose a danger to the safety of any other person or the community if released." When the defendant entered his plea, the Court continued

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the then-existing bail conditions and the Government consented to continuation of those conditions. The Government does not consent to any further modifications of the defendant's bail conditions given the procedural posture of this case and the defendant's upcoming sentencing.

Respectfully submitted,

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Southern District of New York

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